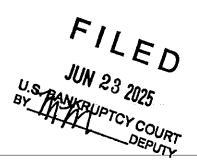
Karen Lynn Hash 1277 HCR 3138 N Hillsboro, Tx 76645 (512) 785-3715 tkhash@hotmail.com



#### UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF TEXAS / WACO DIVISION

IN RE:

Terry Mack Hash and Karen Lynn Hash Debtor(s)

**Brenda Keily** Plaintiff

V

Karen Lynn Hash Defendant

Bankruptcy Case No. 24-60670-mmp Chapter No.7

Adversary No. 25-06001-mmp

#### MOTION FOR EXTENSION OF TIME TO OBTAIN LEGAL COUNSEL AND COMPLY WITH SCHEDULING ORDER

Karen Lynn Hash ("Movant), the Defendant in the above captioned adversary proceeding, respectfully request an extension of time to All parties asserting or resisting claims of relief shall serve on all other parties, but not file, the discovery required by Federal Rule of Civil Procedure 26 (a)(1) on or before 6/23/25. And states in support of this Motion:

1. The Movant is currently seeking legal counsel to represent her in this adversary proceeding. Due to the complexities of this matter and the

need to find an attorney experienced in **bankruptcy adversary proceedings**, this search has taken longer than anticipated, the initial attempts to secure representation were unsuccessful.

- 2. Movant has taken multiple actions to find legal counsel such as contacting numerous attorneys, seeking help from entities such as Legal Aid, Texas State Bar, etc. with no success. Few attorneys in the Western District of Texas do not have expertise in this area or require large retainers, or due to Movant's bankruptcy filing are unwilling to accept the case. Attached Exhibit Altonianing list of Attorneys contacted and list of services contacted.
- 3. An extension is necessary to allow Movant sufficient time to obtain competent legal representation to navigate the legal process and ensure that her rights are properly protected.
- 4. The Movant request an extension of 30 Days, July 23, 2025.
- 5. The Movant asserts that good cause exists for granting this extension because the inability to obtain legal counsel is a reasonable and unavoidable impediment to complying with the current deadlines set forth in the Scheduling Order. The Movant has exercised diligence in seeking representation, and the requested extension is necessary to prevent prejudice to her case.

**WHEREFORE**, the Movant request that this court extend the deadline for All parties asserting or resisting claims for relief shall serve on all other parties, but not file, the disclosures required by Federal Rule of Civil Procedure 26 (a)(1) on or before **7/23/25**, and grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

June 21, 2025

Karen Lynn Hash Karen Lynn Hash

## LIST OF ATTORNEYS SERVING WESTERN DISTRICT OF TEXAS WACO DIVISION. ADVERSARY PROCEEDINGS/BANKRUPTCY

- 1. DAVID KOHMS 817-764-1375 MESSAGE /NO RETURN CALL
- 2. PAKIS LAW 254-379-9720 NOT TAKING NEW CASES
- 3. ERIN SHANK 254-690-4110 NOT TAKING NEW CASES
- 4. EVAN SIMPSON .254-399-9977 MESSAGE / NO RETURN CALL
- 5. LEINART BANKRUPTCY LAW 469-804-5437 DOES NO ADVERSARY
- 6. LUNDBERG LAW 972-775-3500 CANT DO ADVERSARY NOW
- 7. ALMAND LAW 817-225-0572 NOT TAKING NEW CASES
- 8. JD LAW 214-369-6422 CANT HELP
- 9. NORRED LAW 817-704-3984 \$150 CONSULT APPT. 6/30/25 2:30
- 10. CHANCE MCGEE CANT HELP

Vin 1

- 11. JENNIFER WERTZ MESSAGE/NO RETURN CALL
- 12. CHRIS JAMESON DONT DO ADVERSARY
- 13. WEYSER KAPLAN 214-552-7242 WANTS 10 TO 20K RETAINER
- 14. GUY HARVEY HOLMAN CANT HELP
- 15. TITTLE LAW FIRM 469-956-7944 CANT HELP
- 16. GARY LYON 214-620-2034
- 17. DAVID TEKEL 254-776-5095
- 18. HAYWARD LAW 972-755-7100 WANTS 15K RETAINER PLUS
- 19. BEARD KUTEGEN 254-776-5500
- 20. TYLER SIMS 254-304-7161 WONT HELP MY BANKRUPTCY ATTY.
- 21. FRANK LYON 512-345-8964 WONT RETURN PHONE CALLS
- 22. DAVID ALFORD 254-297-7300 CANT TAKE CASE
- 23. ARNOLD & ITKIN 888-493-1629 NEVER RETURNED CALL

### LIST OF LEGAL HELP

- 1. LEGAL HELPLINE 877-969-3412
- 2. LEGAL HELPLINE FOR TEXANS 1-800-622-2520 EXT 3
- 3. TEXAS STATE BAR
- 4. ATTORNEY HOTLINE 817-336-4101
- 5. TX LEGAL SERVICES 512-477-6000
- 6. VOLUNTEER LEGAL SERVICE OF CENTRAL TEXAS 512-476-5550
- 7. TEXAS LAW HELP 800-662-2520 X-3
- 8. LEGAL AID NW TX 888-529-5277 OR WAXAHCHIE 972-923-3344

#### **CERTIFICATE OF SERVICE**

Thomas G. Kemmy, Kemmy Law Frem P.C. I tomekemmylaw.com State Bar No. 11254600 1924 N. Main AUE San Antonio, TX 78212 (210) 750-1019

Tyler Sims, Sims Law PLLC leafesims lawpile. com 600 Austin Ave, ste-23, waco, TX 76701 (254) 304-7161

James Studensky listudensky. trustee e outlook.com 3912 w. Waco Drive Waco, Texas 76710 Bankrupky Trustee

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

IN RE:

Terry Mack Hash & Karen Lynn Hash	8	CASE NO. 25-0001
Debtor §		
	<b>§</b>	Chapter 7-Adversary
8		Time to Obtain Legal Counsel and Iuling Order
to Obtain Legal Counsel and Comp	oly with ruptcy c	ease. Having reviewed the Motion, the
•		the Motion for Extension of Time to cheduling Order shall be, and hereby